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October 2, 2024

VIA ECF ONLY

Hon. Kimba M. Wood, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 26A
New York, New York 10007

MEMO ENDORSED

Re: *Patsy's Brand, Inc. v. I.O.B. Realty, Inc.*
Case No. 99-cv-10175-KMW

Dear Judge Wood:

We represent plaintiff Patsy's Brand, Inc. ("Patsy's Brand"). We write to the Court again now in connection with its recent orders dated September 24th and 27th, 2024. (ECF 484 and 492, collectively the "Orders".)

Regrettably, our letter to the Court yesterday failed to contain a separate request for an extension of time in connection with the Orders regardless of whether the Court adopts Patsy's Brand's proposal of permitting the factual record to be completed before any resulting briefing is filed. For the reasons explained below, in the event the Court declines Patsy's Brand request filed yesterday (ECF 495), it respectfully requests a **10-day** extension of time, until October 18, 2024, to file its responses to the Orders.

Pursuant to § 1.G of Your Honor's Individual Rules, this is Patsy's Brand's first request for an extension of time in connection with the Orders. Defendants and certain respondents have withheld their consent —albeit without explanation — while attorney Roffe has no objection to this request.

As required by Fed. R. Civ. P. 6(b)(1)(A), Patsy's Brand submits good cause exists for the requested extension of time. In addition to the press of other matters before this and other courts, Patsy's Brand's counsel will be observance of the Jewish High Holiday — Rosh Hashanah — which begins later this evening at sundown and runs through Friday evening. The loss of these two days to observe the holiday leaves Patsy's Brand with little time to draft its submissions if the

Hon. Kimba M. Wood, U.S.D.J.
October 2, 2024
Page 2 of 2

Court's October 8, 2024 deadlines are not extended. Accordingly, it is respectfully submitted that the time for Patsy's Brand's to file its responses to the Orders be extended through October 18th, 2024.

The Court's continued attention to this matter is appreciated.

Respectfully submitted,



A handwritten signature in blue ink, appearing to read "JG MacMull".

Joel G. MacMull

cc: All Counsel of Record (*via ECF*)

In response to this request for an extension of time and the request for an extension of time in ECF No. 495, the Court extends both parties' time to submit post-hearing submissions and documentation supporting damages to October 28, 2024.

SO ORDERED.

**DATED: New York, New York
October 7, 2024**

/s/ Kimba M. Wood
KIMBA M. WOOD
UNITED STATES DISTRICT JUDGE